

## REMARKS

Claims 1 and 22 have been amended, and claims 2-6, 23-29 and 51-54 have been cancelled without prejudice. No new matter has been added by virtue of the amendments. For instance, support for the amendments appears e.g. at page 4, lines 19-26; page 6; and the original claims of the application.

Claims 1-6, 22-29 and 51-53 were rejected under 35 U.S.C. 103 over Knors (U.S. Patent 5800963) in view of Brunsvold et al. (U.S. Patent 5338818).

Claims 1-6, 22-29 and 51-53 were rejected under 35 U.S.C. 103 over Foster et al. (U.S. Patent 6165682) in view of Knors et al. (U.S. Patent 5800963).

Claims 1-6, 22-29 and 51-53 were rejected under 35 U.S.C. 103 over Motoyama et al. (EP 408334) in view of Knors et al. (U.S. Patent 5800963).

For the sake of brevity, these three Section 103 rejections are addressed in combination. Each of the rejections is traversed.

Claims 1 and 22 (the only pending independent claims) each calls for:

an organic underlayer composition that comprises (i) a first resin that comprises phenol groups and (ii) a second resin that is distinct from the first resin and comprises one or more anthracene groups;

a photoresist composition coating layer over the underlayer composition, the photoresist comprising one or more resins that comprise Si groups, phenolic groups and photoacid-labile groups

These organic underlayer compositions and photoresist compositions are preferred aspects of Applicants' invention. See, for instance, the present application at page 4, lines 19-26; page 6; and the original claims.

None of the cited documents, whether considered alone or in combination, disclose such an organic underlayer composition with such an above photoresist composition.

Thus, for instance, the Knorr document does not disclose an underlayer composition that comprises multiple resins, or a photoresist that comprises Si groups.

The Brunsvold document is similarly deficient and does not describe an underlayer composition that comprises that comprises (i) a first resin that comprises phenol groups and (ii) a second resin that is distinct from the first resin and comprises one or more anthracene groups, as Applicants disclose and claim.

In fact, Brunsvold actually *teaches against* Applicants' invention and reports placing an anthracene compound in a photoresist composition rather than an underlayer. See BrunsVld at column 3, lines 29-39.

The Foster document is also distinct and does not disclose, *inter alia*, a photoresist composition that includes a resin having phenolic groups.

The Motoyama is similarly distinct and does not disclose, *inter alia*, a photoresist composition that includes a resin having phenolic groups or an underlayer having multiple resins.

In view thereof, reconsideration and withdrawal of the rejections are requested.

Cameron et al.  
U.S.S.N. 10/717,975  
Page 5

It is believed the application is in condition for immediate allowance, which action is earnestly solicited.

Respectfully submitted,



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